



## State of New Jersey

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Alison A. Hess, C.P.G.  
Project Manager  
USEPA Region 2  
290 Broadway, 19<sup>th</sup> Floor  
New York, NY 10007-1866

October 21, 2014

Re: Standard Chlorine Chemical Company (SCCC) Site  
1015 to 1035 Belleville Turnpike  
Town of Kearny, Hudson County  
SRP PI# G000001583  
Activity Number Reference: RPC000001

Dear Ms. Hess:

The New Jersey Department of Environmental Protection (NJDEP) has completed its review of the September 2014 Baseline Human Health Risk Assessment Report for the Standard Chlorine Chemical Company (SCCC) Site. The NJDEP reviewed the above mentioned document in accordance with its guidance and policy, and provides the following comments and/or recommendations for your consideration.

### Comments

1. Please be advised that the NJDEP does not utilize baseline risk assessments to determine whether remediation is needed on a site. The need for remediation is based on exceedances of NJDEP's Soil Remediation Standards and other media standards NJAC 7:26D) as well as conformance to the Technical Requirements (NJAC 7:26E). This risk assessment was reviewed, in accordance with standard EPA guidance, including USEPA's Risk Assessment Guidance for Superfund, Vol. I, 1989 (RAGS). Therefore, while the NJDEP has provided comments on the risk assessment, NJDEP does not require such a risk assessment and will base its remediation determination on NJDEP's policies and procedures.

2. A deed notice and an approved Remedial Action Permit for Soil will be needed in any areas where contaminants are present in concentrations above NJDEP's Residential Direct Contact Soil Remediation Standards (RDSCRS). Similarly, all areas where contaminants are present in concentrations above NJDEP's Non-Residential Direct Contact Soil Remediation Standard (NRDCRS) must be detailed by contaminant and contaminant concentration and addressed in accordance to the NJDEP's policies and procedures. The same applies to contaminants with screening levels. The Impact to Ground Water pathway must also be addressed.

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3. The results of the risk assessment are overall acceptable. The NJDEP basis its review on adherence to the NJDEP Soil Remediation Standards and Technical Requirements, NJAC 7:26E.

4. While the site has several Interim Remedial Measures (IRM) in place, and a slurry wall and steel sheet pile wall separates the site from the Hackensack River, it is imperative that the site be investigated as a potential source of contamination to the Hackensack River.

5. All data has been included in this risk assessment, including areas with interim remedial measures (IRMs), and is considered acceptable.

**Section 4.3 [Identification of Contaminants of Potential Concern (COPC)]**

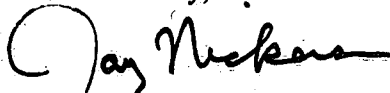
United States Environmental Protection Agency's Regional Screening Levels (RSLs) of 0.000018 parts per million (ppm) (industrial) and 0.0000045 ppm (residential) have been used to select for dioxin present (Table 4.2). This is acceptable as it is more conservative than the NJDEP's screening level of 50 parts per trillion (ppt).

**Section 4.3.1 and 4.3.2 (Surface and Sub surface Soils)**

Please note that the NJDEP does not distinguish between soil depths in terms of contaminant exposure. All soil must meet NJDEP's RDCSRS or be deed noticed with an approved Remedial Action Permit for Soil.

If you have any questions regarding this matter, you may contact me at (609) 633-1448.

Sincerely,



Jay Nickerson  
Bureau of Case Management, Site Remediation Program  
New Jersey Department of Environmental Protection

cc. Jay Nickerson, BCM, NJDEP  
Steve Byrnes, BEERA, NJDEP  
David Van Eck, BGWPA, NJDEP  
Swati Toppin, ETRA, NJDEP